

EXHIBIT A

Hillary Stakem

From: Hillary Stakem
Sent: Thursday, April 6, 2023 10:29 AM
To: Hillary Stakem
Subject: RE: Anadarko

On Apr 3, 2023, at 4:56 PM, Dan Drosman <DanD@rgrdlaw.com> wrote:

Hi Lauren,

We have not heard back regarding our proposed call for Wednesday. Please let us know a time that works.

In addition, under the schedule in place, plaintiffs' responses to defendants' motion for summary judgment and three motions to exclude plaintiffs' experts are due on April 20, 2023. However, since the parties agreed to that schedule, there has been a significant development impacting those motions. Specifically, the Court granted plaintiffs' motion to compel documents related to the AAC investigation, holding that defendants waived any attorney-client privilege and attorney work-product protections as to the "entire subject matter of the AAC investigation." Dkt. No. 173 at 9. In light of this ruling and the impending production of a substantial number of previously-withheld documents directly related to plaintiffs' claims we think it would make sense to postpone further briefing on defendants' motion for summary judgment. It would be unfair to require plaintiffs to respond to defendants' MSJ on an incomplete record, particularly given the importance of the subject matter at issue. With respect to *Daubert* briefing, we anticipate that plaintiffs' experts may wish to incorporate certain of the previously-withheld documents into their analyses. Nevertheless, we would like to move forward with *Daubert* briefing on the current schedule, assuming defendants agree that they will not file additional *Daubert* challenges following any supplementation of the reports.

We propose amending the briefing schedule on defendants' MSJ so that plaintiffs' response is due 21 days after defendants complete their production of previously-withheld documents. If defendants agree that they will not seek to file a second round of motions to exclude following any supplementation of expert reports, the schedule for *Daubert* motions would be unchanged. If defendants do not agree, plaintiffs' opposition to those motions also would be due 21 days after the production is complete.

Given timing, and the need for the court to rule, could you let us know by end of day tomorrow if this works?

Thanks,

Dan

On Mar 31, 2023, at 6:05 PM, Dan Drosman <DanD@rgrdlaw.com> wrote:

Lauren,

Are you available Wednesday to meet and confer regarding the issues identified in the order the Court issued today? Please let us know what times that day work best for you. Have a good weekend.

Best,
Dan

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